

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HAOYANG YU, *et al.*

No. 19-cr-10195-WGY

MOTION FOR FRANKS HEARING

Defendant, Haoyang Yu, respectfully moves for a hearing pursuant *Franks v. Delaware*, 438 U.S. 154 (1978), to enable inquiry about multiple false and misleading statements and material omissions underlying a dozen search warrants issued in this case.

In support of this motion, Mr. Yu submits the accompanying Memorandum with supporting exhibits and Declaration of Manfred J. Schindler with supporting exhibits.

Respectfully submitted,

HAOYANG YU

by his attorneys,

/s/ William Fick

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 22, 2020.

/s/ William Fick